## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RICHARD T. FARREN	)
Plaintiff,	) )
vs.	) Civil Action No. 04-995
EXPERIAN INFORMATION	)
SOLUTIONS, INC.	)
and	)
TRANSUNION, LLC	)
and	)
ANDERSON FINANCIAL NETWORK, INC.	)
and	)
GMAC	)
and	)
RJM ACQUISITIONS FUNDING, LLC	)
Defendants.	) ) )

## PLAINTIFF'S STATEMENT OF STIPULATED FACTS

The facts listed as stipulated below are the only facts on which the parties agreed in their summary judgment briefing to this Court. (*See* RJM Motion for Summary Judgment and Plaintiff's Opposition at ¶¶ 3, 5, 9, 10, 12). Indeed, it was only Plaintiff who admitted certain facts as articulate by Defendant RJM Acquisitions Funding, LLC ("RJM"). RJM has not agreed to any of Plaintiff's facts. Plaintiff's counsel sent e-mail correspondence to RJM's counsel requesting whether RJM would stipulate to any of the additional facts enumerated by Plaintiff in his response in opposition to RJM's motion for summary judgment, but no response was provide by RJM.

## **AGREED FACTS:**

- 1. RJM received a consumer dispute verification form ("CDV") from Experian on or about July 21, 2003, stating that the Plaintiff had notified Experian that he disputed the RJM collection account on his credit report.
- 2. RJM's representative wrote the RJM account number that corresponded with the account referenced in the CDV on the top right hand corner of the CDV.
- 3. RJM reported back to Experian by forwarding the filled-in CDV back to Experian that the account information had been verified as reported.
- 4. On or about July 25, 2003, RJM received a CDV from Trans Union disputing the accuracy of the RJM collection account as reported by RJM.
- 5. First, RJM's representative wrote the RJM account number that corresponded with the account referenced in the CDV on the top right hand corner of the CDV.

Respectfully submitted,

FRANCIS & MAILMAN, P.C.

BY:

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